

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

UNITED STATES OF AMERICA

v.

Case No. 3:07CR00001

KEVIN ALFRED STROM

SIXTH MOTION IN LIMINE:
EXCLUSION OF POLICE INTERVIEW

Comes now, the defendant, Kevin Alfred Strom, through counsel and respectfully moves this Honorable Court to rule *in limine* as to the admissibility of certain evidence relating to an interview of the defendant by the police on October 23, 2006, portions of which are anticipated to be offered by the government at trial, representing the truth of the following:

On October 23, 2006, the defendant was interviewed by Detective Brian O'Donnell and Greene County Sheriff Scott Haas in relation to allegations of possession of child pornography. The interview did not relate to any allegations of enticement of a minor or of obstruction of justice.

The Court has previously severed charges relating to child pornography. Introduction of evidence from this interview will be taken out of context and should be excluded. To do otherwise, allows the government to get into evidence that the Court has previously ruled is inadmissible in the present trial.

WHEREFORE, for the foregoing reasons, as well as for any other reasons that may appear to the Court, your defendant

respectfully moves the court to rule *in limine* to exclude any evidence of an October 23, 2006 interview with police.

Respectfully submitted,

KEVIN ALFRED STROM
By Counsel

Counsel:

S/Andrea L. Harris
Andrea L. Harris
Asst. Federal Public Defender
401 East Market Street, Suite 106
Charlottesville, VA 22902
(434) 220-3387
VSB 37764
Andrea_Harris@fd.org

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: counsel of record; and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: none.

S/Andrea L. Harris
Andrea L. Harris
Asst. Federal Public Defender
VSB 37764
401 E. Market Street, Ste. 106
Charlottesville, VA 22902
Tel (434) 220-3387
Andrea_Harris@fd.org